

Before the
UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Santa Fe Post Office
Santa Fe, Missouri

Docket No. A2012-120

PUBLIC REPRESENTATIVE COMMENTS

(March 30, 2012)

I. Summary

The Administrative Record (AR) does not show substantial evidence for supporting the Final Determination to close the Santa Fe Post Office. Putting together the multiple pieces of information the Postal Service is showing the Commission in this record, the Public Representative (PR) is at a loss to identify one piece of substantial evidence. Collectively, the pieces of evidence appear to be simply a collection of items grouped for convenience to tell a story.

For these reasons, the PR would ask that the Commission consider remanding the Final Determination and return the matter back to the Postal Service for further consideration.

II. Introduction

The PR believes with the new PO-101 Handbook of Discontinuance Procedures (2011 version) that applies in this Appeal,¹ this AR raises a large red flag as to the result of the Postal Service providing even less instruction than in the previous Handbook. Several common pieces of information contained in some of the older standardized forms were omitted in this proceeding. The result in this Appeal, using the new Handbook, is less data, and a bit more conflicting solitary data on which the Commission must judge the Postal Service's statutory compliance.

¹ <http://www.prc.gov/Docs/74/74154/USPS%20Handbook%20PO-101%20USPS-LR-N2011-1-1.pdf>

Missing items in this AR such as post office boxes at both losing and receiving post offices, “workload” missing more specific numbers such as incoming, dispatched mail, and walk-in window transactions, even further contributes to the insignificance and arbitrary nature of the AR evidence that was submitted.

Workload changes or decline are not shown. The small year-to-year changes and patterns at least in the walk-in revenue figures themselves, since this is occurring nationwide, are not substantial evidence showing anything of significance to justify this closing. Community members report there has not been running water or restrooms at this Post Office for as long as they can remember. What has changed?²

The “leaner, greener, faster, smarter, version”³ of the discontinuance procedures handbook is likely to make discerning compliance with the Postal Service’s statutory obligations even more difficult. (The Handbook discontinuance procedure descriptions are even more general; contain no standard forms, and few concrete specific data inclusion examples. It’s telling that the size of the new Handbook size has been reduced by nearly 75 %.)⁴

III. Analysis

Customer Concerns

Customer comments made throughout the AR essentially plead⁵ with the Postal Service to retain the Post Office due to the importance of its role in the community and the distance those in the Santa Fe community would need to drive to obtain full postal retail services (~30 miles round-trip minimum for the closest retail facility, a further distance for others). Customer comments state that many in the community are retired, elderly and this travel distance as well as the incurred costs to obtain complete postal services, would be a hardship. There is no other business in town, and some

² The PR believes that additional contrary evidence will be needed in some circumstances, particularly in some areas that are ambiguous to judge or if the Postal Service is granted an automatic “benefit of the doubt” in all cases or continually in certain “interpretation-variable” parts of the statute. In cases where it may be warranted, this also significantly increases the burden on the general public to prepare a stronger case along with even more substantial accompanying evidence.

³ <http://about.usps.com/what-we-are-doing/green/report/2010/ourpeople.htm>, “leaner, greener, faster, smarter.”

⁵ The Postal Service lists in the Administrative Record (AR) that one of the reasons it had considered closing the Santa Fe Post Office was due to “insufficient customer demand.” At AR PDF page 4, “office workload” is also mentioned as a reason for discontinuance. An “EAS-53” allows for a part-time post office workload. It is not clear to the PR, if by mentioning “minimal workload” the Postal Service simply means it has decided to close all part-time post offices or some change in workload has occurred.

customers reported that the assigned administrative Post Office is not in the direction where they typically travel out of town to do their shopping.

The AR omits any mention of the Postal Service acknowledging in the record post office box holders. In actuality, there are confirmed post office box holders at the Santa Fe Post Office that have not been mentioned or accounted for in both the initial proposal and in the Final Determination. All other Postal Service prepared forms or summaries make no mention of any post office box holders. A number of customer questionnaires and optional comment forms indicate they receive their mail at the Santa Fe Post Office—some specifically checked post office box on their questionnaire form.⁶ Likewise, no mention is made anywhere in the AR as to whether the administrative office/retail post office has a sufficient number of available post office boxes.

Economic Analysis

Since the economic cost figures additions/subtractions and items compiled are unique (in a bad, even more confusing way) in this AR, the PR would respectfully ask the Commission to consider remanding the Final Determination on this point alone. There is a huge array of AR sheets containing what seems to be varying arrangements of about 5,000 different numbers. Frustratingly enough, totals don't add up (some figures in the same column are subtractions, some are additions, some have been multiplied by ten years, one applies for only one year and some items included in the economics savings were leaps of faith as to what they were, where it would go and whether it was like other "savings" that get moved to the other post office (and aren't in actuality a savings to the Postal Service). Sometimes the totals changed for what seemed like the same things in the public postings.

The Santa Fe Post Office is open part-time and staffed by a non-career postmaster relief (PMR) employee.⁷ The Postal Service includes its typical "econo-hypothesis" line item depiction for employee savings (i.e., hypothetical employee, hypothetical full-time status and hypothetical benefits). The general public doesn't get the Postal Service's

⁶ The questionnaire "check-boxes" are spaced closely and it wasn't clear if respondents were checking the wrong box inadvertently for post office box. The PR was able to reach a community member to confirm that there are others in the Santa Fe community who currently have "boxes" at the Santa Fe Post Office. (see PDF pages 70, 74,82,84).

⁷Reportedly in 2009, a PMR made \$9.50 an hour. Given this part-time annual salary, extremely small lease amount for what looks like a large shed, and the amount of walk-in revenue, the Postal Service is likely financially in the black and not incurring a financial loss at this Post Office. <http://www.postalexam.com/postal-jobs/details/postmaster-relief-replacement/>

“forward-looking” thinking on this part, and because none can do the math at least in this AR, most likely believe they are being duped.

IV. Conclusion

Taken collectively, the facts presented for the closure seem arbitrary.⁸ The economic analysis presented in this docket particularly, stands out as an alarm of the evidence presented, and likely has eroded trust in the Postal Service.⁹

The PR respectfully asks the Commission to consider remanding the Final Determination to close the Santa Fe Post Office because the evidence presented in this AR is arbitrary, and in the PR’s experience, the “economic analysis” falls so far below any government policy making agency in the Federal government.

Respectfully submitted,

/s/ Manon A. Boudreault
Manon A. Boudreault
Public Representative
901 New York Avenue, NW Suite 200
Washington, DC 20268-0001
(202) 789-6852: Fax (202) 789-6861
e-mail: manon.boudreault@prc.gov

⁸ If the answer to whether the evidence submitted in this AR is arbitrary depends on whom you ask, and whether the benefit-of-the-doubt favor should be awarded to the Postal Service or the General Public, then the PR believes this may be a more concrete screener for determining the meaning of “arbitrary.”

⁹ In 1973, the American Statistical Association—Federal Statistics Users’ Conference Committee on the Integrity of Federal Statistics reported that:

“Nothing could undermine the politician and implementation of his policy recommendations as much as an accumulated and intense public distrust in the statistical basis for the decisions which the policy-maker must inevitably make, **or in the figures by which the results of these decisions are measured.** Unless definite action is taken to maintain public confidence in Federal statistics and in the system responsible for their production, there will be growing tendencies to distrust leadership.” (emphasis added)

Attachment: The Administrative Record PDF Pages referred to in this proceeding are shown below. If this does not appear on your view, the page navigation feature needs to be checked (See screen shot that follows. Steps are :click on View Tab, choose ToolBars, then click/choose page navigation).

PDF Pages are shown here.



